

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America)

v.)

THOMAS DONNELLY)
(DOB XX/XX/1985))

Case No. 25 MJ 112

Defendant(s)

CRIMINAL COMPLAINT

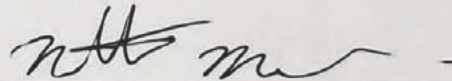
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 1, 2023 - June 18, 2025 in the county of Waukesha in the
Eastern District of Wisconsin, the defendant(s) violated:

| <i>Code Section</i> | <i>Offense Description</i> |
|--|--|
| 18 U.S.C. 2252A(a)(2)(A), 2252A(b)(1), 2252A(a)(5)(B), and 2252A(b)(2) | distribute and possess child pornography |
| 18 U.S.C. 2251(a) and 2251(e) | attempt to produce child pornography |

This criminal complaint is based on these facts:

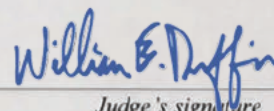
Please see Affidavit.

☒ Continued on the attached sheet.

Complainant's signature

Nathan Markon, Special Agent - FBI

Printed name and title

Sworn via telephone; transmitted via email
pursuant to Fed. R. Crim. 4.1Date: 06/18/2025

Judge's signature

City and state: Milwaukee, Wisconsin

Honorable William E. Duffin, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

I, Nathan Markon, being first duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed since July 2024. I am currently assigned to the Milwaukee Division as a member of the Violent Crimes Squad. While employed by the FBI, I have investigated federal criminal violations related to child sexual exploitation and child pornography. As a result of my training, experience, and discussions with other law enforcement officers assigned to investigate child pornography and child exploitation, I am familiar with methods by which electronic devices are used as the means for receiving, transmitting, possessing, and distributing images and videos depicting minors engaged in sexually explicit conduct. I have also received training specific to this violation and have gained experience in interview and interrogation techniques.

2. The facts contained in this affidavit are known to me through my personal knowledge, training, and experience, and through information provided to me by other law enforcement officers, who have provided information to me during the course of their official duties and whom I consider truthful and reliable.

3. Based upon the information described below, I submit that probable cause exists to believe that on or about January 7, 2024 and June 18, 2025, and between October 2023 and August 2024, THOMAS DONNELLY, DOB: [REDACTED] 1985 used various online and electronic means to distribute and possess child pornography, in violation of Title 18, United States Code, Sections 2252A(a)(2)(A), 2252A(b)(1), 2252A(a)(5)(B), and 2252A(b)(2), as well as attempted to

produce child pornography, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

4. Because this affidavit is submitted for the limited purpose of obtaining a criminal complaint, I have not included every fact known to me concerning this investigation. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE

5. On or about March 20, 2024, an adult female from the United Kingdom submitted an online tip to the FBI National Threat Operations Center (NTOC). The tip claimed THOMAS DONNELLY, hereafter referred to as the Subject, was grooming minors via social media and soliciting, distributing, and possessing CSAM. The complainant claimed the Subject formed an emotional relationship with the complainant, who was an adult at the time of their interaction. According to the complainant, the Subject coerced the complainant into sending explicit photos of herself next to pictures of herself as a minor. The Subject also coerced her into roleplaying wherein the complainant would take the role of a 12-year-old. The complainant listed the Subject's age as 40 years old.

6. The tip also claimed that the Subject coerced her into watching CSAM and that she observed him masturbating to the CSAM. The Subject introduced the complainant to a 14-year-old girl that lives in Wisconsin. The Subject claimed to be in a relationship with the 14-year-old girl. The complainant spoke with the 14-year-old girl multiple times. The Subject sent the complainant CSAM of the 14-year-old girl, as well as other minor females.

7. On or about March 21, 2024, a Special Agent with FBI-Milwaukee interviewed the complainant via telephone. The complainant claimed the Subject lives in the area of New Berlin,

Wisconsin. The complainant also provided multiple social media usernames for the Subject, including the Discord username “FrankiePeanuts” and Snapchat username “loweffortname6.”

8. A Special Agent with FBI-Milwaukee requested a search of CyberTipline Reports from the National Center for Missing and Exploited Children (NCMEC) with the search term “THOMAS DONNELLY” and various social media usernames associated with the Subject. CyberTipline Report 183924709, generated on January 7, 2024 from Discord identifies username “.frankiepeanuts” as uploader of one file of Child Pornography.

9. On or about January 31, 2025, FBI Milwaukee received the media file associated with CyberTipline Report 183924709. The file is described:

- a. Image 1 is a horizontally oriented full-color image. The image depicts a naked adult male kneeling on a blue padded surface. The adult male is visible from the chest to knees. A prepubescent female approximately three to five years old is laying on her back in front of the adult male. Her torso, one leg, and one arm are visible. The adult male is kneeling between the prepubescent female’s legs. The prepubescent female is wearing a pink and white shirt that is pulled up to expose her stomach. The adult male is holding his penis with one hand and the prepubescent female’s leg with the other. The adult male is pushing his penis down on top of the prepubescent female’s vagina, creating partial vaginal penetration with his penis.

10. On or about March 5, 2025, a Court Order signed by United States Magistrate Judge William Duffin was served to Snap Inc. for target identifiers linked to the Subject, including username “loweffortname6.” On or about March 10, 2025, Snap Inc. provided returns, including a “friends” list associated with “loweffortname6.” One user on the Subject’s friends list, hereafter known as “User 1”, was noted as blocked and deleted within the returns.

11. Through legal process and open-source research User 1 was identified and found to be living in the United States, in the southeastern area of the country. FBI Agents contacted User 1’s family, who identified User 1 as a minor, year of birth 2008. An interview was scheduled between User 1 and an FBI Child and Adolescent Forensic Interviewer (CAFI).

12. During that interview on May 6, 2025, User 1 disclosed she met the Subject online on a Discord server in the fall of 2023, when she was 15 years old. User 1 identified the Subject's Discord username, ".frankiepeanuts", as belonging to the Subject. User 1 also identified the Subject by name based on a driver's license photo shown to her.

13. During the forensic interview, User 1 disclosed that the Subject solicited her for nude pictures. According to User 1, the Subject directed User 1 to undress, then to strike herself to the point of leaving marks or bruises. The Subject also directed User 1 to choke, cut, and burn herself while video chatting. The Subject took screenshots of User 1 in various states of undress and after conducting self-harm. User 1 told the forensic interviewer that she could hear clapping noises and heavy breathing during these video chats, implying the Subject was masturbating.

14. If User 1 didn't comply with the Subject's directions, the Subject would threaten to harm User 1's friends or other people. In at least one instance, the Subject threatened to go outside his residence and find someone to hurt if User 1 did not remove her clothes during a video chat. The Subject knew some of User 1's online friends and threatened to make them self-harm.

15. According to User 1 the Subject made other requests of User 1 that covered a range of other sexual topics. These topics included asking her to drink her own urine and if he could send her a video depicting bestiality. He referenced wanting to have a child with User 1, and then sexually abuse that child. The Subject referenced wanting to sell nude pictures of User 1.

16. According to User 1, the Subject sent sexually explicit media to User 1, including a 30 second video of the Subject's girlfriend, an adult known to the investigators, conducting oral sex on the Subject.

17. According to User 1, the Subject directed User 1 to communicate with another user via Tumblr, hereafter known as User 2. User 2 is an adult male known to investigators. The Subject

told User 1 he wanted her to communicate with User 2 because the Subject wanted User 1 to gain sexual experience. User 2 was geographically close to User 1. In August 2024 User 2 met with User 1 and took her to a hotel late at night, where User 2 sexually abused User 1. User 1 observed User 2 pointing their phone camera at User 1 while User 2 sexually abused User 1.

18. Between May 26, 2025, and June 9, 2025, the FBI conducted three periods of surveillance on the Subject's residence. They observed both the Subject and the Subject's girlfriend at the residence. They also observed a vehicle registered to the Subject, a 2001 Mercury Grand Marquis, grey in color, Wisconsin license plate 858YSY, parked outside his apartment.

19. On June 16, 2025, the FBI was made aware of a second NCMEC CyberTipline Report, number 208367814. This report named username "tiredolddad1" as the subject of distributing CSAM (child sexual abuse material) via Discord on March 30, 2025, with the associated email tiredolddad1@gmail.com. Legal process was served by Wisconsin Department of Justice to trace the IP address used by the email. The IP Address came back to the Subject's residence. The file distributed by the Subject is described herein:

- a. The file was a color video approximately 1 minute and 51 seconds long. It depicted a white naked prepubescent female minor being sexually assaulted by a male of undetermined age via vaginal intercourse. From the video angle the female appeared to have no breast development. Based on her body structure, size, and facial features the female appeared to be under 10 years old. The female's body appeared hairless. She had dark eyes, dark eyebrow hair, and dark hair on her head. Her hair appeared short or tucked behind her head as she lay supine with her legs spread and arms raised to shoulder height. The female looked upward, to the side, and toward the male. There was an approximately quarter sized circular birthmark or dark spot near the front of her right shoulder. Both of her knees appeared to have scabs on them. The female spoke in a foreign language at the onset of the video. The language sounded similar to German. During the video she made labored breathing and whining sounds as the male thrust into her. She appeared to be on top of a dark colored couch or bed with black pillows, gray pillows, and a multicolored blanket. From the video angle the male of undetermined age appeared to be white and much larger than the female. The front of his lower torso and tops of his upper legs were visible. He appeared hairless. During a portion of the assault he held the

right side of the female's torso. His hand was large enough to reach from her navel to the her back.

20. On June 18, 2025, the FBI executed a search warrant signed by United States Magistrate Judge William E. Duffin at the Subject's residence in Waukesha County, Eastern District of Wisconsin. During the initial preview of the Subject's personal computer, at least four images of CSAM were found and are described herein:

- a. Image 1 and 2 are two full color pictures depicting an infant, approximately 1-2 years old. The photos are cropped close to only show the infants face. An adult penis is in close proximity to the infant's open mouth.
- b. Image 3 is a full color picture depicting a female toddler. The picture is cropped close to show only the child's face. An adult penis is in the toddler's mouth, with the child's hand around the penis.
- c. Image 4 depicts a pre-pubescent female, approximately 5-8 years old, laying on her back with legs spread apart. An adult male conducts vaginal intercourse with the pre-pubescent female. Visible in the background is a pillow. Also shown in the image is the text: "Contact me" with a web address.

CONCLUSION

12. Based on the foregoing, there is probable cause to believe that THOMAS DONNELLY used various online and electronic means to distribute and possess child pornography, in violation of Title 18, United States Code, Sections 2252A(a)(2)(A), 2252A(b)(1), 2252A(a)(5)(B), and 2252A(b)(2), as well as attempted to produce child pornography, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).